

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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|--|---|--------------------------------------|
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| DINOSAUR FINANCIAL GROUP, LLC, | : | |
| HILDENE CAPITAL MANAGEMENT, | : | Case No. 1:22-cv-1860-KPF |
| LLC, and SWISS LIFE INVESTMENT | : | |
| MANAGEMENT HOLDING AG on behalf | : | |
| of themselves and all others similarly | : | <u>[PROPOSED] STIPULATION</u> |
| situated, | : | |
| | : | |
| Plaintiffs, | : | |
| | : | |
| -against- | : | |
| | : | |
| S&P GLOBAL, INC., AMERICAN | : | |
| BANKERS ASSOCIATION, and FACTSET | : | |
| RESEARCH SYSTEMS INC., | : | |
| | : | |
| Defendants. | : | |
| | : | |
| | X | |
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**[PROPOSED] STIPULATION REGARDING SCHEDULE FOR ANSWER AND
PROPOSED CASE MANAGEMENT PLAN**

WHEREAS, on February 14, 2023, Defendants filed their Motion to Dismiss the Second Amended Class Action Complaint, on April 3, 2023, Plaintiffs filed their Opposition to Defendants' Motion to Dismiss the Second Amended Class Action Complaint, and on April 27, 2023, Defendants filed their Reply Brief in Further Support of Defendants' Motion to Dismiss the Second Amended Class Action Complaint;

WHEREAS, on July 14, 2023, this Court entered an order granting in part and denying in part Defendants' Motion to Dismiss the Second Amended Class Action Complaint;

WHEREAS, the Court's July 14, 2023 Order provides that Defendants are directed to file an answer to the remaining claims on or before August 7, 2023 and further provides that the parties are to submit a proposed case management plan on or before August 14, 2023;

WHEREAS, due to scheduling conflicts including in other matters over the next thirty days, Defendants requested an additional approximately 30 days to draft and file Answers to the Second Amended Class Action Complaint and an additional approximately 30 days for the parties to meet and confer regarding a proposed case management plan;

WHEREAS, Plaintiffs have no objection to Defendants' request for such extension under the terms set forth in this stipulation;

WHEREAS, the parties have agreed that, during this period, the parties will hold a Rule 26(f) conference after which the parties will be free to commence written discovery and will negotiate an appropriate protective order, a stipulation governing the disclosure and non-disclosure of certain information regarding experts and consultants, and a protocol for the production of electronically stored information; and

WHEREAS, this is the parties' first request for an extension of both the deadline to file an answer and to submit a proposed case management plan.

IT IS THEREFORE STIPULATED AND AGREED AMONG THE PARTIES that,

1. The deadline for Defendants to answer the Complaint shall be extended from August 7, 2023 to September 8, 2023.

2. The deadline for parties to file a proposed Scheduling Order and Civil Case Management Plan shall be extended from August 14, 2023 to September 13, 2023.

SO STIPULATED:

Dated: July 27, 2023

/s/ Ronald J. Aranoff

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*Attorneys for Defendant American Bankers
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SO ORDERED.

Dated: _____
New York, New York

Katherine Polk Failla
United States District Judge